

The removal tool claimed in claim 1 (and dependent claims 2-6) is generic. The tool is generically shown in FIGS. 116, 117 and a modification is shown in FIGS. 92, 93. This tool works in conjunction with the following species:

- (A) FIGS. 1-6, 8, 9, 11 (claim 3 is not FIGS. 8, 9, 11) [single tine design]
- (B) FIGS. 7, 10 [single tine depending from end plate]
- (C) FIGS. 12-22 [peripheral ring with depending tines]
- (D) FIGS. 23-35 [top hat, insert plus top hat, peripheral ring with protruding tines, box, pipe lock]
- (E-1) FIGS. 36-46 [clip locks]
- (E-2) FIGS. 42, 43 [clip locks hidden][uncertain whether removal tool would work with a hidden locking unit]
- (F) FIGS. 47-58, 62, 65 [locking unit on clip with single thread nut, single tine on nut, box with locking unit, integrated locking unit and thread]
- (G) FIGS. 59-61, 63, 64, 66-68 [locking unit with integral nut thread]
- (I) FIGS. 94-102 [blind hole, expanded version of removal tool (FIGS. 99, 101, 102)]
- (J) FIGS. 103-115 [modified blind hole, partial wall mounted tine]

Species which do not work with removal tool of claim 1:

- (H) FIGS. 69-93 [locking units with slide closures]

**Applicant elects species:**

- (D) FIGS. 23-35**

**Claim groups for elected species:**

**Claims 1-6**

Claims 7, 8, 13-17

Claims 24-27

Claims 28-29, 34-38

No traversc. Claims not specified herein do not fall within elected species D. The inventorship is correct. The election set forth herein is consistent with the pending parent case. In the parent case, applicant generally elected FIGS. 30b and 30c, the locking insert disposed in the recess of the nut (FIGs. 30f, and 35e). The present case relates to a removal tool for use with various inserts.

Respectfully submitted,

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